

EXHIBIT 25

1 IN THE UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF MISSOURI
3 CENTRAL DIVISION

4 MARY HOLMES, L.V., DENISE)
5 DAVIS, ANDREW DALLAS, and EMPOWER)
6 MISSOURI,)
7 Plaintiffs,)
8 vs.) No. 2:22-cv-04026-MDH
9 ROBERT KNODELL, in his official)
10 capacity as Acting Director of)
11 the Missouri Department of Social)
12 Services,)
13 Defendant.)

14
15 ZOOM DEPOSITION OF TONI SNELLER
16 TAKEN ON BEHALF OF THE PLAINTIFFS
17 JUNE 15, 2023

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19
20
21 STENOGRAPHICALLY REPORTED BY:
22 Rebecca A. Brewer, RPR, CRR, CCR#478
23
24
25

1 A Just that it was long, lots of questions, it's
2 a long day, be sure you drink lots of water because you
3 do all the talking.

4 Q Okay. Thank you.

5 And did you review any documents to
6 prepare for today?

7 A No. No.

8 Q All right. And so, Ms. Sneller, what is your
9 current job title, please?

10 A Program manager.

11 Q Okay. And how long have you been in this
12 role?

13 A Since April 15th.

14 Q Of 2023?

15 A Yep, 2023.

16 Q And as you stated, prior to you, Nichole
17 Conway was in your role, correct?

18 A Yes.

19 Q Okay. Have there been any change to the role
20 since April 15th when you moved into the job?

21 A Can you clarify like what -- are you asking
22 what she took on and what I took on or --

23 Q No, were there any changes to the
24 responsibilities of the role when you stepped into it?

25 A Not that I'm aware of, no.

1 Q Okay. So your responsibilities are pretty
2 much the same as what Nichole Conway's were?

3 A Well, so she did keep some of her old job
4 duties, like she still does some of the programming of
5 the IVR. But for the most part, I took over everything.
6 We're slowly transitioning into that, because I did just
7 recently get to hire for my previous position and so
8 I've been doing dual duty.

9 Q Okay. Dual duty in your previous position?

10 A Yeah.

11 Q Okay. Do you expect that eventually you would
12 take on those responsibilities that you mentioned, like
13 the IVR or --

14 A As of -- well, I do do a lot of work with the
15 IVR. She's just our main programmer because she has a
16 degree in that. I do help with that, though, already.
17 So if she's out of the office or something needs to be
18 done, I can take that role on. But as of right now, my
19 understanding is she's going to keep that.

20 Q Okay. And so, can you tell me a little bit
21 about the current -- your current responsibilities in
22 your role as program manager?

23 A Sure. So, I oversee the customer experience
24 team and everything that goes along with that, all
25 technology projects, everything that goes along with the

1 customer experience team.

2 And I oversee the call center, so I have
3 managers that are call center managers, but they also
4 have resource centers as well. And I oversee -- there's
5 a total of six of them. We just transitioned to where I
6 no longer supervise the previous staff because I hired
7 someone, but I have a total of six direct reports now.
8 And they are call center and resource center managers.

9 I oversee the operations of the call
10 center, so like scripts, documentation, I am the voice
11 of the IVR. So, any message that has to go on the IVR I
12 record.

13 Q And just -- this is going to be happen a lot
14 because I know we're in acronym heavy land, but can you
15 define what IVR is?

16 A Oh, goodness. I knew you were going to ask
17 that. No.

18 Q Can you explain what it is?

19 A I don't know the exact definition. But
20 basically it's the virtual thing that where you call in
21 and it's reading you your information or reading you
22 prompts. Interactive voice.

23 Q Recognition perhaps?

24 A Yeah, there you go.

25 Q And just for my own clarification, you said

1 A Almost three years.

2 Q Okay. All right. And so can you tell me what
3 a customer service center is? What is it?

4 A Well, depends. Our -- what we've tried to do
5 recently is brand our entire state as a customer service
6 center. So you have -- with the customer service center
7 you have the call center, you have a processing center,
8 you have a resource center.

9 The call center is taking calls.
10 Everybody works -- everybody that can work at the call
11 center is trying to take calls. And then the processing
12 center, they're processing on the back end, that's their
13 main duty, but you have people at the call center that
14 their main duty is the call center, and they do that all
15 day long.

16 At the resource center, it's where
17 clients actually walk in and they ask for assistance
18 from staff there. So every one of those avenues is a
19 way that we can service customers, so we're trying to
20 change the name to customer service center for every
21 location.

22 Q Okay. And so when did that kind of change
23 shift where you've moved these processing centers,
24 resource centers, call center into one overarching
25 customer service center?

1 A Right.

2 Q Okay.

3 A Well, and it goes along with like our jobs.

4 Now, we can post jobs statewide. In the past we had to
5 hire in a certain location.

6 Q And is that because of like hybrid work
7 availability?

8 A Yeah, yeah. We have more office space because
9 we have hybrid workers.

10 Q Okay. So, in terms of this like customer
11 service center, large scale umbrella, are you -- are you
12 in charge of the customer service center?

13 A So, I oversee the Genesys portion of the
14 customer service center. There is two different
15 portions of this. We have Genesys and Current. There
16 are two other program managers that oversee Current.

17 And so, basically, we meet in the
18 mornings and I tell them, this is what the volume is for
19 the call center. They talk to me about what the volume
20 is in Current. And then we make a determination of
21 what's going to happen for the day.

22 Q Okay. And who are those program managers that
23 oversee Current?

24 A Dan Watson and Shelly Kirkpatrick.

25 Q Okay. And can you explain to me what Current

1 is?

2 A Current is our tasking system.

3 Q And what does it task?

4 A So everything, basically. Mostly, I would say
5 most everything we get is in Current. I know there's a
6 couple one-offs that are not in Current, but basically,
7 it's a system where a worker logs in, their duties,
8 their missions are assigned based on the critical cues
9 of the day.

10 So like right now it's application
11 registration and so their task is assigned to that and
12 they just hit a button and the next task comes up with
13 the next application that needs to be registered.

14 Q Okay. And is that something that call center
15 staff are able to access as well or are there tasks
16 coming from another --

17 A So their task -- their calls come from
18 Genesys. But they do enter every call into Current.

19 Q Okay. So those do intersect?

20 A Yeah, well, they don't talk to each other.
21 It's a manual process.

22 Q I see. So every call they take, they have to
23 manually enter into Current, the Current task-based
24 system?

25 A Yep.

1 have to pick up the phone and call someone, but they
2 don't have that actual person in their ear.

3 Q Okay. So they're -- and just so that I'm -- I
4 understand, when you say doing casework, they're like
5 reviewing applications?

6 A They could be or they could be like
7 verification comes in, so if we requested additional
8 verification, they could be working that. Or they could
9 be, if an application comes in, registering that so that
10 an interview can take place.

11 Q Okay. And how does this compare to staff who
12 like in a previous, you know, who would be considered
13 working at a processing center, how does that compare to
14 their duties?

15 A It's a little bit different. So, processing
16 center, typical processing center staff have a scheduled
17 time that they're on the phones each day. And, again,
18 this depends on volume. So, like I know the volume, the
19 last couple of weeks it's exploded so they really
20 haven't been following the schedule, but they're
21 supposed to be on four hours of their shift on the
22 phones.

23 And then we have a rotation of offices
24 that stays on after those four hours. Every day it's
25 different. But, the other people after those four hours

1 will go into processing verifications or app
2 registration or stuff like that.

3 Q Okay.

4 A To whereas a call center worker, they're on
5 the phone eight hours.

6 Q Okay.

7 A Usually.

8 Q But could be pulled off to do certain
9 processing tasks?

10 A Not as much. Usually they're on the phone,
11 typically. They do have a rotation of processing time,
12 but it's only one day a week.

13 Q Okay. All right. And you said that there was
14 like an explosion. Is that an explosion of processing
15 documents that's happened?

16 A It's kind of a perfect storm. June is a very
17 busy month for us due to, there's several things that
18 it's due to. I mean, college kids are moving home. You
19 have the kids coming home from summer school and so
20 they're needing more money because their kids are home
21 now. So it's kind of a perfect storm for us.

22 But June is also a month that we
23 typically see people start going on vacations and so we
24 have staffing issues with that. But then also we had
25 some applications that need to be registered, and so

1 then when that happens, they load into the predictive
2 dialer which then we have to put staff on that, which
3 then takes away from our incoming volume.

4 So it's kind of your perfect storm that
5 happened these last several weeks.

6 Q And so, you talked about people being on the
7 phones. Can all customer service center staff conduct
8 SNAP eligibility interviews?

9 A I would say all that are fully trained, except
10 for your resource centers that have clients that come
11 into their office all day.

12 Q Okay. And when you say "fully trained," what
13 does that mean?

14 A So, we don't hire someone and just directly
15 put them into SNAP interviews. They have to go through
16 program training. And because most of our cases are
17 combo cases, meaning that they have SNAP or MHABD or
18 TANF, we do want them fully trained on all programs
19 before we put them into interviews, because it's bad
20 customer service for us to only be able to complete part
21 of the case.

22 Q And how long does it take, typically, for an
23 individual that's been hired to become fully trained?

24 A I believe it's been shortened to 12 weeks.

25 Q Okay. And so, staff that are still going

1 call right then. So if that is an interview, yes, they
2 will do that. But interviews cannot be conducted via
3 live chat.

4 Q Okay. And just to get clarification about
5 what you just said, when someone -- so are you saying
6 when someone calls to schedule an appointment for an
7 interview, that's handled on the phone, the interview is
8 actually done at that time?

9 A Well, they're typically not calling to
10 schedule an appointment. They can do it through our
11 chat. And that's typically how our appointments get
12 scheduled, but if they say I need an interview and I
13 said I want you to call me at 9 a.m. today, when I call
14 and I say I need my SNAP interview done, they do the
15 interview.

16 Q Okay. I just want to make sure I understand.
17 So, can you take me through this one more time? So,
18 someone sends a message to the interview scheduler via
19 chat?

20 A Yep, usually.

21 Q And says I need a SNAP interview at 9 a.m. --

22 A Well, they don't tell us what they need an
23 appointment for. They just schedule the appointment.
24 And so then, when we call them, we say, okay, we're
25 calling about your appointment that you scheduled. How

1 can we help you? And that's when they would tell us,
2 well, I need my interview completed.

3 Q I see.

4 And that is when the interview would then
5 get done?

6 A Yeah.

7 Q Okay. I understand. Thank you for taking me
8 through that.

9 A That's okay.

10 Q So how is it decided which staff will like do
11 interviews on a given day?

12 A Usual -- like, you mean for just call center?
13 Are you talking about processing centers?

14 Q I guess, let's -- let's start with call center
15 but it sounds like they're all somewhat intertwined so I
16 think, you know, I will want to know about processing
17 center and resource center as well.

18 A So we don't have very many people that take
19 Tier 1 calls. Typically those are our more tenured
20 staff, is how we do that, because they get the more
21 complex questions. They sometimes get the more complex
22 cases. So, it's usually staff that -- anybody -- when
23 they're first -- after they first leave training they
24 can take interviews. We put them on interviews first to
25 get them used to taking interviews.

1 about the predictive dialer, the volume?

2 A Yep.

3 Q Okay. Is there a particular wait time that
4 you're shooting for when you're re-allocating staff? Is
5 there a goal?

6 A So, we were given a goal several weeks ago of
7 45 minutes. I will be very honest with you. It's hard
8 to maintain that goal without -- I mean, processing gets
9 behind if we maintain that goal, being very honest with
10 you. When I'm sending red flags up, it's usually
11 because the wait time and interviews is an hour and a
12 half. And in Tier 1, I'm usually sending a red flags up
13 if we're getting close to the three-hour mark.

14 Because another thing about Tier 1 is
15 everything that they're calling about on Tier 1 can
16 either be found at their resource center or online or on
17 chat. And so, that queue tends to have a higher wait
18 time because those aren't as critical as a SNAP
19 interview.

20 Q That makes sense.

21 So when you said, to get to that
22 45-minute goal processing takes a hit, is that because
23 in order to reach that 45-minute goal you're pulling so
24 many people from processing?

25 A Yeah. I mean, like we -- when we're hitting

1 that goal, that's like every person that I can
2 physically get on the phone is on the phone. All day,
3 though. And the problem with that is then our
4 processing gets behind, and then what happens is we
5 create more phone calls for ourself, and so --

6 Q Okay. And you said that this 45-minute goal
7 was kind of decided on a few weeks ago. Who decided on
8 that number?

9 A So, I believe it was through Kim discussing
10 with Robert in the department what happens, because they
11 were telling us, you need to get the wait times down,
12 you need to get the wait times down. We're like, But
13 how low do you want them? You know, and so they finally
14 gave us, you know, we would like to see average -- our
15 average wait time to be 45 minutes for all queues.

16 And that's another thing that I do
17 throughout -- throughout the day is I look at our
18 average wait time and determine like -- it's a
19 calculation. So determine, okay, well, yes, the hold
20 time says this, but I know in about 30 minutes I have 10
21 people coming from lunch so it's going to go down to
22 this so am I going to stay within that daily goal.

23 Q So very delicate balance is what I'm hearing.

24 A Yeah.

25 Q And just for the purpose of the transcript,

1 when you say Kim and Robert, are you referring to Kim
2 Evans and Robert Knodell?

3 A Yep.

4 Q Is there like any written criteria or policy
5 that lays out the circumstances where, you know, staff
6 need to be moved?

7 A We don't have anything in writing, no.

8 Q So this goal, this 45-minute wait time goal,
9 is that in writing anywhere or was that just
10 communicated to you?

11 A No, it's just communicated to us, yeah.

12 Q Okay. And you said that you're looking at
13 dash boards -- when you're in front of your desk, you're
14 looking at dash boards pretty much all day, correct?

15 A Pretty much. Unless I have like an engage or
16 something that pulls me away that I can't watch it. But
17 if I am at my desk, usually I have it up on another
18 screen and I'm watching it.

19 Q And is that giving you real-time numbers --
20 okay.

21 A Yeah.

22 Q And it's giving you real-time numbers of the
23 outbound dialer numbers, the inbound Tier 3 calls?

24 A Yes.

25 Q And also the Tier 1 inbound calls?

1 A Yes, all of those.

2 Q Okay.

3 A And it would have chat and text on there as
4 well.

5 Q Okay.

6 A Because if our chat wait times get low, I do
7 move those people to interviews or Tier 1. Wherever the
8 greater need is.

9 Q So you mentioned this 45-minute goal. You
10 know, do you have a goal as the program manager of a
11 wait time that -- that people should not wait more than
12 a certain amount of time? Do you have your own personal
13 goal?

14 A I mean, I've worked in a call center for a
15 very, very long time. Before I was here I worked for
16 two different call centers, so I know wait time is an
17 issue. But due to the staffing level that we have now,
18 45 minutes is hard to maintain.

19 So when I'm looking at it, if it hits an
20 hour, maybe even an hour and a half, I'm -- I'm going to
21 let them process. It's when we start hitting that a
22 little bit over an hour and a half, like an hour 35, I'm
23 starting to ask to get them on, because I know it's
24 going to take them a second to get them on, and then we
25 can get that down.

1 I would say average overall, yeah, an
2 hour is what I would say on interviews. And then for
3 reporting changes, really, like I said, it can be done
4 online and so -- and we message that on the IVR. Like
5 you don't need to talk to us. You can chat us, you
6 know, you can go to your resource center, stuff like
7 that.

8 So for them, realistically when I'm
9 looking at it, if it's two hours, two and a half, then
10 I'm calling people to come on.

11 Q Can you tell me a little bit about your
12 previous call center experience? You said that you used
13 to worked at two different call centers. What did you
14 do?

15 A So I used to work for WIPRO and I was a
16 Medicaid pharmaceutical technician, because that's what
17 I went to school for. And then I worked at
18 YoungWilliams, but the child support side of it.

19 Q Did you work for YoungWilliams when it was
20 doing the call center for DSS?

21 A So, when I left they had just won the
22 contract --

23 Q Okay.

24 A -- to be the call center.

25 Q Okay. Were there -- in those call centers,

1 Q And so you said you are able, through like
2 sending -- I think you called them maybe red flag
3 e-mails -- you're able to pull processing staff into the
4 call center in real time?

5 A Right.

6 Q And even though you're not necessarily their
7 direct supervisor, they must abandon what they're doing
8 and come into the call center if they receive your
9 e-mail?

10 A Right. That is what -- so, I e-mail their
11 manager directly and their manager distributes that
12 message to the front line workers. But -- and then I
13 look at the number of staff that I have being added to
14 the queue. Again, I don't know each office off the top
15 of my head, but if it looks like the number keeps going
16 up, then I assume that they've added their staff.

17 Q Okay. And you mentioned -- I believe you
18 mentioned the call center hours, but can you just remind
19 me again what they are?

20 A Yeah, they're 6 a.m. to 6 p.m.

21 Q Okay. And is that Monday through Friday?

22 A It is Monday through Friday. The outbound
23 dialer, though, has different hours.

24 Q What are those hours?

25 A It doesn't start until 7 a.m. and it finishes

1 by -- well, it stops making callouts at 5:30.

2 Q And if it's not finished with its -- with its
3 calls for the day, does it just roll those over into the
4 next business day?

5 A Yes, it does. Typically, though, that
6 dialer -- so it's set up that typically if it's a normal
7 dialer day, it finishes before that 5:30. So sometimes
8 we finish at 11 a.m., sometimes we finish at two.
9 Sometimes we don't get through the list. It just
10 really -- what it depends on is how many people are
11 answering the phone and connecting with us and how many
12 staff we have on it.

13 Q Could you -- like in your role, could you
14 decide to extend call center hours?

15 A Oh, no. I don't have that authority.

16 Q Okay. Who would have that authority?

17 A I believe that would either have to come from
18 Kim or the director's office.

19 Q Okay. Are there any other options or things
20 that you're looking at when the wait times are exceeding
21 your goal of 45 minutes? Are there any other things
22 you're looking at doing to reach your goal?

23 A Like I said, I'm pulling the processing. So
24 recently we've pulled all those schedules for all the
25 staff in the state and we've looked at people that are

1 A best practice, if I'm seeing my staff,
2 my staff that I directly supervise, if I see them in an
3 interview over an hour, I'm usually saying is there
4 something I can help with, are you stuck? I'm usually
5 reaching out to them. And it's not so much of a "you're
6 taking too long," it's a "do you need my help."

7 Q Right. Right. Okay. That makes sense. And
8 the complicated nature of certain households makes sense
9 to me.

10 Okay. Going back to this exhibit,
11 Exhibit 2, do you still have that pulled up?

12 A Yeah, I believe so.

13 Yeah, I do.

14 Q Okay. Great.

15 So if during like a call to Tier 3, if an
16 applicant needs to request an accommodation because of a
17 disability, at what point in the IVR flow could they
18 make such a request?

19 A I don't see an option for that.

20 Q So no option for them to do that. Would they
21 be able to make a request to like a live person when
22 they reached a live person?

23 A Are you talking about like hearing impaired
24 and stuff like that?

25 Q Exactly, yes.

1 A Yeah, we do have a process once they get to a
2 live person for hearing impaired people.

3 Q And what does that process look like?

4 A It's kind of similar to our language services,
5 but there is a contractor that assists us with that.

6 Q Okay. Like another example would be somebody
7 who, you know, might have a developmental disability or
8 whatever and might need more explanation for the
9 questions. Is that something that they could request?

10 A Not -- not that I'm aware of. But like I have
11 had staff that have had those type of calls in the past
12 and what they do is they just slow down and take their
13 time with them and, you know, are reconfirming.

14 So our staff are trained to deal with
15 those situations. I would say they just handle it the
16 best that they can. And if an accommodation is
17 requested, they could always reach out to their
18 supervisor and see how we go about that. We did have a
19 recent request for like braille and we worked through
20 that. They just go up the channel to their supervisor
21 and then eventually it gets back to us upper management
22 and we work through how we can accommodate the client.

23 Q Is that then marked anywhere? So like your
24 braille client, for example, like if somebody needs
25 braille, is that noted anywhere in their file?

1 A No, it's never been. That's what I'm meaning;
2 is we decided we should not change those hours. When we
3 extended call center hours we don't feel like we should
4 extend predictive dialer.

5 Q I see.

6 Has there been any conversation about
7 starting predictive dialer later in the day?

8 A Not that I'm aware of. What happens is if we
9 can get through that list in the morning, then we can
10 shift more people to inbound interviews, so then we can
11 get that wait time down. That's why we do try to finish
12 that list.

13 Q Okay. All right. And which staff are working
14 on the predictive dialer?

15 A The staff -- so they're dual skilled. And
16 what that means is they're -- they're skilled to Tier 3
17 inbound and Tier 3 outbound, typically. And so, they
18 will either get an inbound or an outbound call. And
19 outbound calls do take priority.

20 But sometimes, like if we have every
21 client answering, there is a little bit of time between
22 when we can get a call there, and that's when they would
23 get an inbound call as well. And those are staffed by
24 your call centers, processing centers typically. Call
25 center and processing center.

1 Q And the staff that are assigned to the
2 predictive dialer, do they work it until the predictive
3 dialer finishes making their outbound calls?

4 A It depends on the size of dialer load. So if
5 the dialer load is big for the day, then yes, they'll
6 stay on the whole time. But if it's a small dialer load
7 then the processing center staff are doing their four
8 hours.

9 Q And just so that, like I can conceptualize
10 this, what would be like a big predictive dialer load?

11 A Anything above 2,500 --

12 Q Okay.

13 A -- in a day.

14 Q And what would be like a small predictive
15 dialer load?

16 A 1,300.

17 Q Okay. Okay.

18 So the window between big and small is
19 somewhat narrow?

20 A Well, it's because that's about how many we
21 can get through in a day.

22 Q 2,500?

23 A Yes.

24 Q Okay.

25 A Even if you're calling for assistance from

1 other entities, that's about what we can get through in
2 a day. So anything above 2,500 usually they're on all
3 day.

4 Q Okay. Does it happen frequently that there
5 are more than 2,500 calls in the predictive dialer?

6 A Before the last several weeks, no. But
7 it's -- I didn't get to look today because I'm here.
8 But it's been -- the last two weeks, it's been well
9 above 2,500. And that's because app registration got
10 behind.

11 Like I told you, that perfect storm hit
12 us and every one of those apps that they registered that
13 was behind went into that.

14 Q When you say "well above," can you give me
15 like an estimation of what that looks like?

16 A Yesterday it was 4,500.

17 Q For the calls that you aren't able to get
18 through in a business day, any leftover calls, are those
19 prioritized the next morning, the next business day
20 morning?

21 A Right. So, when we come in -- like so
22 yesterday we didn't finish the list. Those however many
23 were left are shifted to the top of the list for this
24 morning.

25 Q And just so that I understand the breakdown

1 because I -- I get that it's fluid, but are all staff
2 working on -- and spending time on predictive dialer at
3 the beginning of the day or are there some staff working
4 inbound calls?

5 A There would be some Tier 1 workers working
6 inbound calls as well as your appointments, your people
7 that are on chats, so --

8 Q But all Tier 3 workers are doing outbound
9 calls?

10 A They're doing outbound and inbound, so
11 whichever call comes in first, basically. So if we have
12 all these clients answering and it thinks it's funneled
13 all the calls out, this person may get an inbound call
14 because it thinks it distributed all the calls.

15 Q Okay. So if an inbound call gets in, it would
16 be assigned out to a staff person?

17 A Yeah.

18 Q Okay. But are outbound calls prioritized?

19 A Yep, they're the top priority. That's why
20 there's usually little to no hold time in that queue; is
21 because they are the top priority.

22 Q And how does that look in that kind of
23 funneling system you described? So, if -- I guess what
24 I'm trying to say is if priority is the outbound calls,
25 is there a high likelihood that an inbound call would

1 get in, if people are answering the outbound dialer?

2 A So it's placing calls based on number of staff
3 that it sees available. So that's what happens; is you
4 get people that wrap up an after-call work and it didn't
5 realize that they were available, that's when they'll
6 get an inbound call.

7 Q All right. And how do you make that like
8 allocation between outbound and inbound call or --

9 A Separate queues.

10 Q Okay. So, Genesys is really the one sending
11 the calls to the person?

12 A Right.

13 Q You're not controlling --

14 A Nope.

15 Q You're not like, Mr. Jones is going to take an
16 inbound call right now?

17 A No.

18 Q Okay. Completely automated by Genesys?

19 A Yep.

20 Q Okay. All right.

21 Okay. And so, if a person, a client, is
22 receiving an outbound call and they answer, are they
23 automatically connected with a call center staff person?

24 A No. It asks them a series of questions and,
25 again, I'm not sure of exact verbiage because it's been

1 forever since I recorded these.

2 But, basically, are you the person that
3 completed the application? If you're not the person,
4 can you get the person within the next three minutes?
5 If you're not the person and you can't get the person,
6 please tell them to call us back at this number. And if
7 you select that you are the person or you can get the
8 person, it says do you have time to do your interview
9 now, you know, all of those options are there.

10 Q And if a person like makes it through those
11 prompts, is there ever a chance that they would then
12 have to wait in a queue?

13 A No. That's what I'm meaning, where there's
14 little to no time. The most time they would have to
15 wait is maybe five to ten minutes. But they should not
16 have to wait that long. It's usually like as soon as
17 they get -- they confirm that they have time for an
18 interview, usually they're going right to a worker.

19 And that's what I mean by it takes
20 priority. Like we don't usually have a wait time in
21 that queue because we have it set up to take priority.

22 Q So majority of the time, no wait time?

23 Is that a yes?

24 A Majority of the time, no wait time, yes.

25 Q Okay. I just asked because you were nodding,

1 because it had a queue cap. And so that's -- Genesys
2 does not have a queue cap. You can build as big a queue
3 as long as you're within the criteria that you outline.

4 Q Can you explain to me a little bit more how --
5 just because I truly don't know -- how a queue cap would
6 affect those deflections in CISCO?

7 A Sure.

8 So if there's 100 calls waiting to get
9 into queue, we're playing a deflection message. I don't
10 remember what reports we were able to access in Genesys.
11 And I don't know if that's one of them, but here, it --
12 it's going to be higher because basically we allow so
13 many calls into the queue.

14 It was also higher during this time I see
15 because of the courtesy callback. It would -- that
16 courtesy callback really messed up things. And it
17 would -- we would basically be deflecting first thing in
18 the morning because we're trying to work on the day
19 before's callbacks.

20 Q And can you explain what a courtesy callback
21 is or was?

22 A Yeah, we don't offer those anymore. But what
23 it was is someone could call and say, hey, hold my place
24 in line. And then we would call them back when it was
25 their turn.

1 Genesys to SNAP participants?

2 A Not that I'm aware of. The only thing I can
3 think of is with your traditional call centers and your
4 processing centers, they are told they need to use
5 Genesys to call out. That's really their only mechanism
6 anyway because, again, they just have their computer,
7 they don't have a physical phone. Like I said, it would
8 be the resource centers.

9 Q The resource centers.

10 And particularly in areas where there are
11 those broadband --

12 A Yeah.

13 Q Got it.

14 I'd like to introduce what's been marked
15 as Exhibit No. 8, and if you could let me know when this
16 pulls up.

17 (Deposition Exhibit 8 identified.)

18 A All right. I'm there.

19 Q (By Ms. Holley) Okay. Do you recognize
20 this document?

21 A No. I actually do not recognize this
22 document.

23 Q That's okay.

24 A Did I make it?

25 Q No. I'll represent to you that this is an

1 Excel spreadsheet that bears the Bates label DEF
2 0138512, and it was produced to us in discovery and had
3 a file name that I'm going to read into the record.
4 File name is 0064556010, plus sign, Denise Davis call
5 logs, dot XLXS.

6 And so we converted the spreadsheet into
7 a PDF, which is now Exhibit 8. It's a three-page
8 document. The first two pages contain the information
9 that appeared on the Excel spreadsheet on a tab labeled
10 "Genesys," and the information on the third page -- the
11 third and last page appeared in a tab labeled Umemrol
12 [phonetic].

13 Does that help you understand a little
14 bit better what you're looking at?

15 A Kind of, but --

16 Q Okay. So just looking at Page 1, I was
17 wondering if we could go through these columns and you
18 could tell me what they mean, okay.

19 So I'm starting with "date and time,"
20 what does this mean?

21 A The date and time that the person called.

22 Q And "call path data"?

23 A So that's the path that the call took.

24 Q Can you -- what does that mean?

25 A So, like when I call in, so you'll see --

1 remember that IVR document that you had? So you'll see
2 they called FSD info -- I'm looking at the second one
3 because the first one doesn't give us a lot of
4 information, looks like the client either got the
5 information that they needed and hung up or whatever
6 happened.

7 But on the second one, they called the
8 FSD info number, they picked option English, they picked
9 option food stamps. We authorized them successfully.
10 And then I don't know if it's cut off or whatnot, but --

11 Q Okay. "Authorized successfully" means -- what
12 does that mean?

13 A That means they entered their DCN and we were
14 able to match it and their date of birth and able to
15 match it.

16 Q I'm looking at the third -- third one for
17 January 3rd, 2023, it says "no IVR path," do you know
18 what that would mean?

19 A That's probably a quick hangup or is that the
20 note over there that says predictive dialer called and
21 voice mail was reached?

22 Q Okay.

23 A Does that column go with that?

24 Q I believe it does, yes.

25 A Okay. So, then, that's why there's no IVR

1 path is because the predictive dialer had called and we
2 got a voice mail.

3 Q Okay. And so, the one below that
4 January 4th, 2023, I think I understand this path, but
5 I just want to make sure. It looks like she --
6 Ms. Davis was put on the IVR path, application interview
7 was selected, English was selected, and then she was
8 deflected.

9 A Correct.

10 Q Just want to make sure I understand the call
11 path.

12 Can you tell me what is meant by "hold
13 time"?

14 A Where do you see that one at?

15 Q It's a column up -- it's the column next to
16 call path data.

17 A I'm not sure what they're measuring here,
18 because I'm showing that there's no hold time on this
19 one. I don't know what they have marked as hold time
20 here. I don't know if that's the time they're spending
21 in the IVR, but it can't be because some of them don't
22 have a hold time.

23 Q Okay.

24 A So I'm not sure what it refers to here.

25 Q Okay. "Total interaction time"?

1 A So that would include any time in the IVR plus
2 any time reached to a representative.

3 Q Okay. And then the "connected to a worker"
4 column?

5 A Yeah, that's just if the worker had picked up.

6 Q Okay. And the "queue column," what does that
7 mean?

8 A Whatever queue that they were going into or if
9 they stayed in the IVR.

10 Q Okay. And then the "notes column"?

11 A So the notes, that one refers to the
12 predictive dialer. There's another one that refers to
13 the predictive dialer.

14 Q So are notes manually entered?

15 A That's what it looks like.

16 Q Okay. All right. Now I'm looking at Page 3,
17 which has some new columns.

18 And so I'm wondering, can you tell me
19 what "comment info" means?

20 A No, I don't know what that means.

21 Q Okay. "Included in call logs," that column?

22 A No.

23 Q "Zoom or Genesys," do you know what that
24 means?

25 A I do know what that means.

1 A That one pulled up real quick.

2 Q Oh, good.

3 And so, do you recognize this document?

4 A No, I don't, sorry.

5 Q That's okay.

6 So I'll represent to you that this is an
7 Excel spreadsheet, which is bearing the Bates label DEF
8 0138504 and was produced to us in discovery that had a
9 file name of 00279160 -- or I'm sorry, I'm going to
10 scratch that and start the number again -- 0027913062,
11 plus sign, Andrew A. Dallas, call logs dot XLXS.

12 And we converted that spreadsheet to this
13 PDF, which is now Exhibit 9 to your deposition. It's a
14 six-page document. The first four pages contain the
15 information that appeared in the Excel spreadsheet on a
16 tab labeled "Genesys." The information on the fifth
17 page of this exhibit appeared on the spreadsheet in a
18 tab labeled "Zoom." And the final page of this exhibit
19 is information contained in that same document under a
20 tab labeled "Umemrol comments."

21 Does that help you understand the
22 information on the document?

23 A A little bit, yeah.

24 Q So, it appears to me that the columns on the
25 first four pages, those that were in the Genesys tab,

1 are the same columns that were in Exhibit 8.

2 Does that sound right to you?

3 A Yes.

4 Q Okay. So I'm wondering if you could turn to
5 Page 5.

6 A Yep, I'm there.

7 Q Okay. So this was information that was under
8 the Zoom tab. And just want to make sure I understand
9 these columns as well. "Date and time" you explained to
10 me the date and the time of the call.

11 Can you explain what "talk time" means?

12 A That would be the time that they talked -- the
13 amount of time they talked to a representative.

14 Q Okay. And what "queue" means in this context?

15 A Yeah, it's still the same; queue Tier 1, Tier
16 3.

17 Q Okay.

18 A The N/A -- I see the notes, worker called the
19 client. In CISCO you couldn't pick what queue you were
20 calling out of, so that's why there's no queue.

21 Q Okay. All right. And so, these, based on the
22 dates, would all have been CISCO calls, is that right?

23 A Correct.

24 Q Okay.

25 A Prior to 2021.

1 the top of my head.

2 Q Okay. Can you tell me what this document is?

3 A Looks like call volume.

4 Q Does the data that's reflected in this
5 document, would it exist for 2022 and 2023?

6 A Yeah, it should all exist.

7 Q Okay. So I just want to -- I'm going to go
8 through these charts just to make sure, just to get
9 clarification on if these things are being tracked. So
10 this Tier 1 offered, that's being tracked?

11 A Yep.

12 Q Okay. Tier 1 calls answered?

13 A Yes.

14 Q Okay. Now, I'm on Page 2, Tier 1 calls
15 abandoned?

16 A Yes.

17 Q Okay. And that's a percentage.

18 The percentage of Tier 1 calls deflected?

19 A So we don't call them deflected anymore. We
20 call them redirect calls, because we direct them to
21 self-service options now instead of just playing the
22 message that the queue is full. We direct them to all
23 their options for self-service, including for
24 interviews, you can go to your local resource center.
25 But it's still a number that is collected.

1 Q Okay. It just would be called something else.
2 It would be a redirected percentage?

3 A Yeah.

4 Q Okay. And just for my own notes, self-service
5 options, you mentioned this, interviews -- interviews at
6 local resource centers, what are the other self-service
7 options?

8 A So, for example, you can live chat us, not for
9 interviews, but this is for all other things. Like for
10 Tier 1 specifically, you can live chat us. You can go
11 online to find answers to most of your program
12 questions. You can go to your local resource center,
13 here's the map address, if you need to -- if you need a
14 map. Those are our self-service options. Or you can
15 report changes online and look at your benefits online
16 as well.

17 Q Okay. So you said that there is a map, is
18 that something that they offer on the call, on the Tier
19 1 line?

20 A We don't offer it like sending it to them, but
21 we give them the web address, like it's dss.mo.gov,
22 slash, map, dash, whatever.

23 Q Okay. That makes sense.

24 All right. I'm on the third page.

25 A Okay.

1 feedback from our visits with the customer experience
2 team with the program managers over the resource
3 centers.

4 Q Okay. So, any data shared for those meetings
5 like survey data or anything like that?

6 A We don't share the survey data. We do compile
7 a report and tell them that if they'd like to see the
8 survey data they can reach out to us. Sometimes they'll
9 reach out, but a lot of times they really just want to
10 know what issues do I need to fix.

11 Q Got it.

12 And how often are those meetings held?

13 A Monthly.

14 Q And who attends those?

15 A Myself, Sara Smith, then a couple of the PMs,
16 three of the PMs; Robin Leikam, Kevin Baclesse, and it
17 will be Stephanie White but it's been Shartina Campbell.
18 Those are the ones that usually attend.

19 Q Okay. On the topic of the resource center, so
20 before lunch, you had said something about interview
21 rooms in resource centers.

22 A Right.

23 Q And just so that it's like clear for me, it
24 sounded like you said before COVID the rooms were used
25 for in-person interviews but now those resource staff

1 are using those rooms to conduct phone interviews, is
2 that right?

3 A They can do phone or in-person. It depends on
4 what the client -- like, first it depends on resource
5 and our traffic and, secondly, it depends on client. So
6 like, for example, your big metros, sometimes they will
7 set people in those interview rooms and be able to
8 assist them via the phone because the interview room is
9 far away from their desk.

10 But like in the smaller resource centers,
11 if a client walks in and needs an interview, a lot of
12 times you just take them to the room and do the
13 interview right there.

14 Q So when you say "in the non-metro," they
15 would -- a person was in office asking for an interview,
16 they'd go back to the interview room with another staff
17 person and get that interview done?

18 A Yeah.

19 Q But perhaps in the metro regions --

20 A It depends.

21 Q It depends, but it could happen that you get
22 brought back there and you use the phone to complete
23 your interview?

24 A Yep.

25 Q Okay. And is that a change from -- is that a

1 COVID change in the metro areas?

2 A No, what it is is it's a Current change. Like
3 what I'm -- the resource center I'm thinking about that
4 typically doesn't do the face-to-face is because their
5 lobby traffic is too high and they can't keep staff. So
6 what happens is that interview gets tasked out to
7 another worker in another office and they call the
8 client to do the interview.

9 Q Okay. That makes sense.

10 All right. And has that been exacerbated
11 because of COVID? Like that -- that tasking out
12 staffing issue that you're mentioning, for that resource
13 center with a lot of volume, has that become a -- worse
14 that there aren't staff on site to be able to do those
15 interviews?

16 A I would say it's one of those perfect storms
17 again. Resource center staff aren't able to work
18 distributive work. And so we don't have a lot of people
19 that want to work in the resource center, because then
20 you take away their distributive work. And so it's
21 hard. And specifically in the one office that I'm
22 thinking of, it's hard for us to get staff in there
23 because right across the street we have a federal office
24 that steals our staff pretty regularly.

25 And so, as soon as they pretty much get

1 their foot in the door they're finding out they're going
2 somewhere else, so --

3 Q Where is this office?

4 A It's in Kansas City.

5 And so -- and then the other thing is the
6 processing center staff that work in the same building,
7 they do get to work distributive work and so if a
8 position opens up in that processing center, what we
9 happen to find is our resource center staff are like,
10 hey, it's a lateral, can I transfer because I can do
11 distributive work?

12 Q I see, that makes sense.

13 A And then COVID. I mean, you know, COVID --
14 what we found is after COVID our clients are back to
15 wanting to come into the office.

16 Q Which can bog down some of those metro areas
17 that have already high foot traffic?

18 A Yep.

19 Q Okay. And just so that I understand like the
20 distributive work model, so there are staff that are at
21 these resource centers that if they already have other
22 tasks, wouldn't be able to do an in-person interview,
23 and that interview would get tasked out to someone who
24 is not physically present in the resource center?

25 A Right.

1 Q Okay.

2 A It's still another resource center worker, but
3 likely it's from a rural area where they don't have
4 heavy foot traffic.

5 Q So that's why it would be a call to that
6 resource center worker in the rural area?

7 A Yeah. Also if they need an interpreter.
8 Instead of the worker putting their phone at their desk
9 on speaker so both the client and the worker can handle
10 the call, we put the client in an interview room and
11 then we call that number into the interview room with
12 the interpreter to maintain that confidentiality.

13 Q Got it.

14 So a person could -- a person who needs a
15 SNAP interview could go into a resource center and get
16 an interview in person, correct?

17 A Yes.

18 Q Okay. How -- how would they go about making
19 that request?

20 A So, typically they just walk -- they just walk
21 up to the person that is entering tasks into the system
22 and they say I'm here for my SNAP interview and they
23 would get it.

24 Q In those resource centers that do have more
25 lobby traffic, is there ever like a wait time between

1 the time a person would ask to have their interview
2 completed and getting them connected with a rural
3 resource center worker?

4 A So, all your metro areas do have wait times.
5 It just depends on the lobby traffic, what their wait
6 time is. I mean, even your rural resource centers will
7 have a wait time. Like I recently moved and I'm based
8 in a resource center and there's only one worker. So if
9 she's doing an interview and another client walks in,
10 there's going to be a wait.

11 Q Are those wait times tracked in any way?

12 A They're tracked in Current usually. So, what
13 should be happening is as soon as a client walks in, it
14 should be being entered into Current to be triaged. And
15 what that just means is, what are you here for? Okay.
16 This is what you're here for. They enter the DCN, they
17 enter the name, and they say this person's here for a
18 SNAP interview and then move on.

19 Q Okay. And then would something be entered
20 when that person receives their SNAP interview?

21 A Right. Yeah, the task is then picked up and
22 they start working that.

23 Q Got it. Okay.

24 So you said there's wait times in every
25 resource center. Like in the metro areas, what's a wait

1 time -- what's a realistic wait time that a person would
2 have to experience?

3 A It depends what metro area you're going to.
4 Jennings Resource Center, it's nothing for them to have
5 a line out the door. You're talking about a two-hour,
6 two-and-a-half hour wait. Again, that's a staffing
7 issue.

8 As well as the location of the resource
9 center is where it really needs to be. That's a lower
10 poverty area, the clients -- it's on the bus route,
11 clients can get there very easily. It's very
12 conveniently located, so it's very busy. If you move
13 down the road to Chouteau, you're probably looking at
14 about an hour and a half, so not much difference is
15 there. Lindbergh you're probably looking at an hour
16 still. But I have seen those wait times get up to three
17 to four hours on a busy day.

18 So it just -- it also depends on the
19 staffing level that we have. We all know we have
20 call-ins, and so if I have half of an office out, I
21 cannot pull from another metro because that just puts
22 them behind.

23 Q Right. If someone wanted to call in to get an
24 appointment for a SNAP in-person interview, how would
25 they do that?

1 A Like if someone requires an accommodation, is
2 that what you mean?

3 Q Uh-huh.

4 A If we get notification of an accommodation,
5 yes, we send that up to the chain -- I believe Anna Wise
6 is our contact to help with that.

7 Q And how do you typically get that notification
8 that someone needs an accommodation?

9 A So they go up their chain of command, the
10 supervisors usually talk to their manager, or
11 specifically the call centers that are familiar with me
12 will just send it to me if it's a supervisor and they
13 know they can't handle it.

14 Q Okay. Is that like -- are people trained on
15 those kind of requests when they go through their 12
16 weeks of training?

17 A I don't know if they're trained on that in
18 that 12 weeks. I don't believe so. The training that's
19 12 weeks is usually program training, so --

20 Q Okay. And then are you involved in any FSD
21 policy regarding the Americans with Disabilities Act?

22 A Like policy writing?

23 Q Um-hmm.

24 A No.

25 MS. HOLLEY: Okay. I am very close to being

1 Q Okay. So, you can track -- you can get data
2 on calls dropped by clients as well as data on calls
3 dropped by FSD?

4 A Right. It will tell us the reason the call
5 dropped and it's different for each party.

6 Q Got it.

7 Another terminology question, you
8 mentioned that when we were going through those charts
9 that it's no longer -- the word "deflected" is no longer
10 used and it's now called redirected --

11 A Right.

12 Q -- is that right?

13 A We only use deflected internally.

14 Q I see.

15 So redirected is like for external
16 reports?

17 A Yeah, when we're talking to like -- I don't
18 know, we -- when we're talking to like the department
19 we're saying it's redirected instead of deflected. And
20 the reason for that is because there's new messaging
21 now.

22 In the past we would say things like, I
23 apologize, but at this time we're unable to take your
24 call, please try your call back again later. Now we
25 give them all the options of, we're currently unable to

1 take your call, but these are your options. And that's
2 why we're calling it a redirect because we're not
3 necessarily just saying goodbye. We're giving you all
4 the options and then telling you, try again later if you
5 really still need to talk to us.

6 Q I see. Okay.

7 And just to clarify, you said the
8 department, what do you mean by the department?

9 A Like the department of social services.

10 Q Okay.

11 A We also have call center meetings with other
12 departments sometimes, so that's where we use that word
13 as redirect.

14 Q So it's like an outward facing word?

15 A Yeah.

16 Q Okay. I got it.

17 And so you said there was like a shift in
18 messaging. And so that's when deflected kind of became
19 redirected looping in these other options. When did
20 that shift happen, that messaging shift?

21 A Well, what we did is a mapping out process of
22 the call center with OA and the governor's office, and
23 so -- Office of Administration and the governor's
24 office. And that's when that shifted.

25 Three to six months ago, probably. Yeah,